

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

IN RE: HOLLY KATHERINE HAYGOOD, { CHAPTER 13
{
DEBTOR(S) { CASE NO. R19-42635-BEM
{ JUDGE ELLIS-MONRO

OBJECTION TO CONFIRMATION

COMES NOW MARY IDA TOWNSON, TRUSTEE herein, and objects to Confirmation of the plan for the following reasons:

1. The Debtor(s) has failed to attend the 11 U.S.C. Section 341 hearing.
2. The Debtor(s) has failed to provide the Trustee with a copy of the federal tax return or transcript of such return for the most recent tax year ending immediately before the commencement of the instant case and for which a federal income tax return was filed, in violation of 11 U.S.C. Section 521(e)(2)(A)(i).

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny Confirmation of this Debtor's (s') Plan and to dismiss the case; or, in the alternative, convert the case to one under Chapter 7.

/s/
Albert C. Guthrie, Attorney
for Chapter 13 Trustee
GA Bar No. 142399

Mary Ida Townson, Chapter 13 Trustee
285 Peachtree Center Ave, NE
Suite 1600
Atlanta, GA 30303
(404) 525-1110
albertg@atlch13tt.com

R19-42635-BEM

CERTIFICATE OF SERVICE

This is to certify that on this day I caused a copy of the foregoing pleading to be served via United States First Class Mail, with adequate postage thereon, on the following parties at the address shown for each:

DEBTOR(S) :

HOLLY KATHERINE HAYGOOD
634 RAINS CIRCLE
SUMMERTON, GA 30747

I further certify that I have on this day electronically filed the pleading using the Bankruptcy Court's Electronic Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

CHRIS RAMPLEY, ATTY.

This 17th day of January 2020

/s/

Albert C. Guthrie, Attorney
for Chapter 13 Trustee
State Bar No. 142399

Mary Ida Townson, Chapter 13 Trustee
285 Peachtree Center Ave, NE
Suite 1600
Atlanta, GA 30303
(404) 525-1110
albertg@atlch13tt.com